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February 26, 2018

VIA ECF

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: ***Celgene Corporation v. Dr. Reddy's Laboratories, Ltd., et al.***
Civil Action Nos. 16-7704 (SDW)(LDW)

Dear Judge Wettre:

This firm, together with Perkins Coie LLP, represents Defendants Dr. Reddy's Laboratories, Ltd. and Dr. Reddy's Laboratories, Inc. (collectively, "DRL") in the above matter. We write jointly on behalf of all parties to inform the Court that DRL has proposed to amend its noninfringement contentions for two of the patents-in-suit, and that the parties have reached an agreement, subject to Your Honor's approval, with respect to DRL's proposed amendments. The parties' agreement will avoid motion practice on this issue.

In particular, pursuant to L. Pat. R. 3.7, DRL seeks leave to amend its noninfringement contentions with respect to U.S. Patent Nos. 8,648,095 and 9,101,622. DRL respectfully submits that it has good cause to amend its noninfringement contentions to reflect changes made to its product labeling because the label changes were proposed to FDA after DRL produced its original noninfringement contentions. Plaintiff Celgene Corporation does not oppose DRL's application subject to an opportunity to respond to DRL's amendments within the time allotted under the Local Patent Rules for responding to contentions, as set forth in the below proposed schedule. In light of DRL's agreed-upon amendments to its contentions, Celgene respectfully submits that there is also good cause for Celgene to amend its responses to DRL's noninfringement contentions because Celgene should be afforded the opportunity to respond to DRL's amended contentions, which were previously unknown/unasserted.

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Accordingly, DRL respectfully requests that Your Honor grant its request for leave to amend its contentions and, in turn, also grant Celgene leave to amend its responsive contentions to address DRL's new contentions on the following schedule:

Event	Date
DRL served amended noninfringement contentions for the '095 and '622 patents	1/24/18
Celgene serves amended infringement contentions for the '095 and '622 patents	3/12/18

If this meets with the Court's approval, we respectfully request that Your Honor sign the below form of endorsement and have it entered on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully submitted,

SAUL EWING ARNSTEIN & LEHR LLP

s/ Charles M. Lizza

Charles M. Lizza

*Attorneys for Plaintiff,
Celgene Corporation*

Respectfully submitted,

RIVKIN RADLER LLP

s/ Gregory D. Miller

Gregory D. Miller

*Attorneys for Defendants,
Dr. Reddy's Laboratories, Ltd. and Dr.
Reddy's Laboratories, Inc.*

cc: Outside counsel of record (by ECF and email)

SO ORDERED:

Hon. Leda D. Wettre, U.S.M.J.